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Counsel for Federal Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

)
ALLIANCE FOR THE WILD ROCKIES,)
NATIVE ECOSYSTEMS COUNSEL,)
Plaintiffs,) Case No. 2:22-cv-00062-BMM
)
v.)
DEB HAALAND, et al.,)
Defendants.)
)
)

Federal Defendants respectfully move this Court for a two-week extension, until June 23, 2023, to lodge the Bureau of Land Management’s (“BLM”) administrative record with the Court, and further request that the extension apply to

all subsequent deadlines. Counsel for Plaintiffs have indicated that they do not oppose this request. In support of this motion, Federal Defendants submit as follows:

1. Pursuant to the April 5, 2023, Scheduling Order, ECF No. 14, Federal Defendants served the BLM's administrative record on Plaintiffs' counsel on or before April 28, 2023.
2. Plaintiffs raised issues relating to the sufficiency of the administrative record with Federal Defendants on May 25, 2023.
3. Under the Scheduling Order, Federal Defendants are required to certify and lodge the administrative record with the Court by June 9, 2023.
4. Federal Defendants request a two-week extension on the deadline to lodge the administrative record with the Court because BLM requires additional time to search for and add any missing documents noted by Plaintiffs to the record.
5. Undersigned counsel conferred with counsel for Plaintiffs who indicated that Plaintiffs consent to this request.
6. Federal Defendants have not sought any prior extensions to lodge the administrative record with the Court or to modify the briefing schedule.

NOW, THEREFORE, Federal Defendants respectfully request that the Court grant a two-week extension, until June 23, 2023, for Federal Defendants to lodge the administrative record with the Court. Federal Defendants further request that

the Court amend the Scheduling Order and extend the remaining litigation deadlines by two weeks, such that the following schedule shall govern the dispositive briefing in this matter:

Plaintiffs shall file any motions other than motions related to the administrative record or for summary judgment on or before: June 16, 2023

Federal Defendants shall certify and lodge an administrative record with the Court and serve that administrative record on Plaintiffs' counsel on or before: June 23, 2023

Plaintiffs shall file a motion to supplement or challenge the administrative record on or before: June 30, 2023

Note: The filing of a motion to supplement the administrative record will suspend the Summary Judgment briefing schedule set forth below. The parties shall file a revised briefing schedule within 21 days of the Court's Order resolving any such motions.

Plaintiffs shall file a motion for summary judgment and brief in support (limited to 10,000 words) and declarations in support of standing on or before: July 25, 2023

Federal Defendants shall file a combined cross-motion for summary judgment and response to Plaintiffs' motion for summary judgment (limited to 10,000 words) on or before: September 1, 2023

Plaintiffs shall file a combined response to Federal Defendants' cross-motion for summary judgment and reply in support of their motion for summary judgment (limited to 6,250 words) on or before:

September 29, 2023

Federal Defendants shall file a reply in support of their cross-motion for summary judgment (limited to 6,250 words) on or before:

October 27, 2023

Dated: June 1, 2023.

Respectfully submitted,

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